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Attorneys for Defendants

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

Commodity Futures Trading Commission,

Plaintiff,

v.

Traders Global Group Inc., a New Jersey
corporation, d/b/a “My Forex Funds”;
Traders Global Group Inc., a Canadian
business organization; and Murtuza Kazmi,

Defendants.

Case No.: 3:23-cv-11808

**DECLARATION OF DAKOTA
SPEAS IN SUPPORT OF
DEFENDANTS’ RESPONSE IN
OPPOSITION TO PLAINTIFF
CFTC’S AND TEMPORARY
RECEIVER’S JOINT MOTION FOR
ORDER TO SHOW CAUSE WHY
DEFENDANTS SHOULD NOT BE
HELD IN CONTEMPT**

I, Dakota Speas, declare pursuant to 28 U.S.C. § 1746 that:

1. I am a member of the bar of the State of California and an associate at Quinn Emanuel Urquhart & Sullivan, LLP (“Quinn Emanuel”). I am admitted *pro hac vice* to practice before this Court in this case. I am one of the attorneys representing defendants Traders Global Group Incorporated, a New Jersey corporation doing business as “My Forex Funds,” Traders Global Group Incorporated, a Canadian business organization, and Murtuza Kazmi (collectively, “Defendants”).

2. In total, in the approximately 43 days since Defendants’ counsel, Quinn Emanuel, were engaged on this matter, we have received over 220 emails from and sent over 210 emails to the Temporary Receiver or his counsel, and received over 100 emails from and sent over 130 emails to the CFTC. Some of these emails counts are overlapping.

3. Exhibit 1 is a true and correct copy of a letter R. Zink sent to S. Placona and A. Burden on September 10, 2023 regarding “CFTC v. Traders Global Group Incorporated, et al., Case No. 3:23-cv-11808-ZNQ-TJB (D.N.J.).”

4. Exhibit 2 is a true and correct copy of a letter I sent to S. Placona and A. Burden on September 26, 2023 regarding “CFTC v. Traders Global Group Incorporated, et al., Case No. 3:23-cv-11808-ZNQ-TJB (D.N.J.).”

5. Exhibit 3 is a true and correct copy of emails I sent to S. Placona and A. Burden and received from S. Placona on September 12, 2023 regarding “CONFIDENTIAL – CFTC v. Traders Global Group, Inc., et al.”

6. Exhibit 4 is a true and correct copy of the “Responses and Objection of Traders Global Group Inc. (New Jersey), Traders Global Group Inc. (Canada), and Murtuza Kazmi to Temporary Receiver’s Subpoenas to Produce Documents” from A. Staltari, M. Shaheen, and me on September 27, 2023.

7. Exhibit 5 is a true and correct copy of emails I sent to S. Placona and received from S. Placona on September 21, 2023 regarding “CFTC v. Traders Global Group, Inc., et al.; Civ.

Action No. 3:23-cv-11808.”

8. Exhibit 6 is a true and correct copy of emails I sent to M. Dudas, S. Placona, A. Sodono, A. Burden, E. Streit, and K. Paulson and received from M. Dudas on October 1, 2023 regarding “CFTC v. Traders Global Grp., Inc., et al.; case no. 3:23-cv-11808-ZNQ-TJB .”

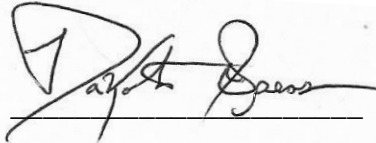
9. Exhibit 7 is a true and correct copy of emails I sent to S. Placona, A. Sodono, D. Perrotta, and M. Dudas on September 14, 2023 regarding “CFTC v. Traders Global Grp., Inc., et al. – Addressing Various Points from Recent Calls Proof_of_Insurance.pdf; godaddy_1.jpg; godaddy_2.jpg.”

10. Exhibit 8 is a true and correct copy of emails I sent to M. Dudas, S. Placona, A. Sodono, and D. Perrotta and received from M. Dudas on September 21, 2023 regarding “CONFIDENTIAL – CFTC v. Traders Global Group, Inc., et al.; Civ. Action No. 3:23-cv-1808.”

11. Exhibit 9 is a true and correct copy of emails I. Sun sent to M. Dudas, A. Sodono, and S. Placona and received from M. Dudas on October 11, 2023 regarding “CFTC v. Traders Global, et al. – Financial Account Information.”

12. Exhibit 10 is a true and correct copy of a letter I sent to S. Placona and A. Burden on October 12, 2023 regarding “CFTC v. Traders Global Group Incorporated, et al., Case No. 3:23-cv-11808-ZNQ-TJB (D.N.J.).”

I declare under the penalty of perjury that the foregoing statements are true and correct and that I executed this declaration in Los Angeles, California on October 13, 2023.



Dakota Speas